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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Petitioner,

v.

C F KOEHNEN & SONS INC.,

Respondent.

Case No. 2:22-mc-00216-TLN-AC

STIPULATION AND [PROPOSED]
ORDER TO CONTINUE ORDER TO
SHOW CAUSE HEARING

Petitioner United States of America and respondent C F Koehnen & Sons Inc., through their respective undersigned counsel of record, stipulate as follows and respectfully request an order pursuant to this stipulation for a continuance of the order to show cause hearing, currently set for today, November 9, 2022, to December 7, 2022.

1. The United States filed its Petition to Enforce Internal Revenue Service Summonses on July 11, 2022. (ECF No. 1).
2. On August 2, 2022, the Court issued a Notice of Hearing and Order to Show Cause setting the matter for hearing on October 5, 2022. (ECF No. 2).
3. On October 5, 2022, the Court granted respondent's motion to continue the October 5, 2022, hearing. (ECF No. 7). That hearing was subsequently set for November 9, 2022.

(ECF No. 8).

4. On November 8, 2022, respondent provided the United States with additional material as called for by the summonses. On November 9, 2022, respondent again provided the United States with additional material.
5. The IRS requires time to review these new productions.
6. Accordingly, the parties stipulate and agree that the order to show cause hearing should be continued to December 7, 2022.

DATED this 9th day of November, 2022.

DAVID A. HUBBERT
Deputy Assistant Attorney General

/s/ Amy Matchison
AMY MATCHISON
Trial Attorney, Tax Division
U.S. Department of Justice

DATED this 9th day of November, 2022.

FISHER BROYLES, LLP

/s/ Gal. N. Kauman
GAL N. KAUFMAN, ESQ.
1200 G Street, NW
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Washington, D.C., 20005


Attorney for C F Koehnen & Sons Inc.

ORDER

Pursuant to the Stipulation of counsel and for good cause shown, IT IS HEREBY ORDERED that the Order to Show Cause Hearing is continued from November 9, 2022, at 11:00 a.m. to December 7, 2022, at 10:00 a.m.

IT IS SO ORDERED.

Dated this 9th of November, 2022


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE